

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

WILLIAM LAWSON, JOE TRIPODI, THOMAS)
WHITTINGTON, JASON PHILLIPS, AND)
NESBIT B. ("BRAD") SILLS, Individually and On)
Behalf of All Others Similarly Situated,)

Plaintiffs,

v.

BELLSOUTH TELECOMMUNICATIONS, INC.,)
d/b/a AT&T SOUTHEAST a.k.a. AT&T)
ALABAMA/AT&T FLORIDA/AT&T GEORGIA/)
AT&T KENTUCKY/AT&T LOUISIANA/AT&T)
MISSISSIPPI/AT&T NORTH CAROLINA, AT&T)
SOUTH CAROLINA/AT&T TENNESSEE,)

Defendant.

Civil Action File No.
1:09-cv-3528-JEC

JURY TRIAL
DEMANDED

JOINT MOTION TO STAY PROCEEDINGS

Plaintiffs William Lawson, Joe Tripodi, Thomas Whittington, Jason Phillips, Nesbit B. Sills, and the opt-in Plaintiffs ("Plaintiffs") and Defendant BellSouth Telecommunications, Inc. ("Defendant" or "BellSouth") hereby jointly move for a stay of all proceedings in the case. As set forth in the attached Memorandum, the parties have agreed to participate in a mediation scheduled for April 19, 2012 of all claims in the captioned case and would like the opportunity to focus their energies and resources on preparing for the mediation.

WHEREFORE, Plaintiffs and Defendant respectfully request that the Court stay all proceedings in the case from April 3, 2012 through May 21, 2012.

Respectfully and jointly submitted,

By: /s/ Steven L. Wittels
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Date: April 5, 2012

By: /s/ William C. Barker
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MEMORANDUM IN SUPPORT OF JOINT MOTION
TO STAY PROCEEDINGS

The Court granted conditional certification of Plaintiffs' Fair Labor Standards Act ("FLSA") claims on August 16, 2011. See Order on Motion to Certify Class [Doc. 98]. Notice was issued to the conditionally certified class on December 15, 2011 and the notice period closed on February 13, 2012. No scheduling order is currently in place. The parties will participate in mediation of the claims in this case on April 19, 2012. The parties would like the opportunity to focus their energies and resources on preparing for that mediation. Therefore, the parties have agreed, subject to Court approval, to briefly stay all proceedings in the

case until thirty (30) days after the mediation.

WHEREFORE, Plaintiffs and Defendant respectfully request that the Court stay all proceedings in the case from April 3, 2012 through May 21, 2012.

Respectfully and jointly submitted,

By: /s/ Steven L. Wittels

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Attorneys for Plaintiffs

Date: April 5, 2012

By their signatures above, counsel for the parties represent that, pursuant to Local Rules 5.1B and 7.1D, this motion and memorandum were prepared in the font of Times New Roman, 14 point.